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16 **UNITED STATES DISTRICT COURT**
17
18 **NORTHERN DISTRICT OF CALIFORNIA**
19
20 **SAN FRANCISCO DIVISION**

21 IN RE: UBER TECHNOLOGIES, INC.,
22 PASSENGER SEXUAL ASSAULT
23 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SAMIRA J. BOKAIE
IN SUPPORT OF LEVIN SIMES
PLAINTIFFS' OPPOSITION TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS CASES FOR
FAILURE TO COMPLY WITH PTO 31
AND SHOW-CAUSE ORDERS**

24 This Document Relates to:

25 *Jane Doe LS 333 v. Uber Technologies, Inc., et*
26 *al., Case No. 3:23-cv-05930-CRB*

27 *Jane Doe LS 397 v. Uber Technologies, Inc., et*
28 *al., Case No. 3:23-cv-05944-CRB*

Jane Doe LS 245 v. Uber Technologies, Inc., et
al., Case No. 3:24-cv-05864-CRB

Jane Doe LS 134 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-03811-CRB

Jane Doe LS 364 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-05237-CRB

Judge: Honorable Charles R. Breyer
Date: January 16, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

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Jane Doe LS 234 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05433-CRB

Jane Doe LS 322 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05572-CRB

Jane Doe LS 191 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05573-CRB

Jane Doe LS 185 v. Uber Technologies, Inc., et al., Case No. 3:23-cv-05922-CRB

Jane Doe LS 303 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05980-CRB

John Doe LS 6 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05316-CRB

Jane Doe LS 54 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05387-CRB

Jane Doe LS 406 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05836-CRB

Jane Doe LS 420 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05739-CRB

John Doe LS 5 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05853-CRB

Jane Doe LS 421 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05941-CRB

Jane Doe LS 430 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05743-CRB

Jane Doe LS 232 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05327-CRB

Jane Doe LS 136 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05475-CRB

Jane Doe LS 296 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06021-CRB

Jane Doe LS 291 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06020-CRB

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Jane Doe LS 504 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05928-CRB

Jane Doe LS 135 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05971-CRB

Jane Doe LS 440 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05862-CRB

Jane Doe LS 304 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05914-CRB

Jane Doe LS 215 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05909-CRB

Jane Doe LS 214 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05777-CRB

Jane Doe LS 125 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05982-CRB

Jane Doe LS 368 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05898-CRB

Jane Doe LS 173 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05885-CRB

Jane Doe LS 206 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05419-CRB

John Doe LS 3 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05760-CRB

Jane Doe LS 548 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-09211-CRB

Jane Doe LS 553 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-01493-CRB

Jane Doe LS 554 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-01693-CRB

Jane Doe LS 583 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-02801-CRB

Jane Doe LS 582 v. Uber Technologies, Inc., et al., Case No. 3:25-cv-02792-CRB

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1 *Jane Doe LS 593 v. Uber Technologies, Inc., et*
2 *al., Case No. 3:25-cv-03269-CRB*

3 *Jane Doe LS 598 v. Uber Technologies, Inc., et*
4 *al., Case No. 3:25-cv-04071-CRB*

5 *Jane Doe LS 601 v. Uber Technologies, Inc., et*
6 *al., Case No. 3:25-cv-04699-CRB*

7 *Jane Doe LS 616 v. Uber Technologies, Inc., et*
8 *al., Case No. 3:25-cv-05942-CRB*

9 *Jane Doe LS 614 v. Uber Technologies, Inc., et*
10 *al., Case No. 3:25-cv-05884-CRB*

11 *Jane Doe LS 620 v. Uber Technologies, Inc., et*
12 *al., Case No. 3:25-cv-06249-CRB*

13 *Jane Doe LS 619 v. Uber Technologies, Inc., et*
14 *al., Case No. 3:25-cv-06243-CRB*

15 *Jane Doe LS 622 v. Uber Technologies, Inc., et*
16 *al., Case No. 3:25-cv-06306-CRB*

17 *Jane Doe LS 626 v. Uber Technologies, Inc., et*
18 *al., Case No. 3:25-cv-06541-CRB*

I, Samira J. Bokaie, declare as follows:

1. I am an attorney who is duly licensed to practice law before all courts of the State of California. I am an attorney at the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
2. The Levin Simes plaintiffs subject to this motion fall for the most part into three categories. First, plaintiffs who should not be subject to this motion. Second, plaintiffs who we have been able to contact who have either additional ride identifying information or will provide a PTO 31 statement. Third, plaintiffs who we have not been able to reach regarding the Court's order.
3. Uber's Exhibit B contains several inaccuracies with respect to Levin Simes plaintiffs.
4. The following five clients should not be subject to this motion because Uber has identified the ride, Plaintiff already indicated that the ride was ordered by someone other than the Plaintiff on the ride identification form, or the Plaintiff is deceased or incarcerated.
 - Jane Doe LS 54: Uber was able to identify a ride that matched the information provided on the Plaintiff's Fact Sheet on October 10, 2025, in its amended Defense Fact Sheet.
 - Jane Doe LS 134: the ride was ordered by an individual other than Plaintiff.
 - Jane Doe LS 191: the ride was ordered by an individual other than Plaintiff.
 - Jane Doe LS 304: Plaintiff is deceased.
 - Jane Doe LS 619: Plaintiff is currently incarcerated.
5. We believe that the following plaintiffs may be incarcerated, but we have not been able to confirm: Jane Doe LS 504, Jane Doe LS 554, Jane Doe LS 626.
6. Obtaining the necessary information from each client identified on Exhibit B is a time-consuming process that we are actively working on. There are several plaintiffs who will be able to comply with the Court's order between the filing of this motion and the hearing date.

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1 7. For these clients, we are in the process of amending ride information forms where we have
2 additional information from the client, or to include information that was included on the
3 Plaintiff Fact Sheet or was provided in records that were later submitted to Uber.

4 8. With respect to the third category, there is a subset of clients contained in Uber's Exhibit
5 B, which remains unresponsive. We are continuing to attempt to reach out to these clients
6 to provide additional ride identifying information, and to comply with the requirements of
7 PTO 31.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed on December 5, 2025, in San Francisco, California.

10 Respectfully Submitted,

11 **LEVIN SIMES LLP**

12 /s/ Samira J. Bokaie

13 Samira J. Bokaie

14 *Attorney for Levin Simes Plaintiffs*

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